

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MARC SAVAGE and  
RANDOLPH BLAKE,  
Plaintiffs,

v.

Civil No. 3:18-cv-30164-KAR

THE CITY OF SPRINGFIELD,  
BERNARD J. CALVI, individually and  
as Fire Commissioner for the City of  
Springfield, and JOSEPH CONANT,  
individually and as former Fire  
Commissioner,  
Defendants.

**A. Claims of Marc Savage**

1. Did Marc Savage prove by a preponderance of the evidence that any of the Defendants retaliated against him based on his participation in protected activities by subjecting him to a retaliatory hostile work environment or by other retaliatory acts?

The City of Springfield:

\_\_\_\_\_ YES

  X   NO

Bernard Calvi:

\_\_\_\_\_ YES

  X   NO

Joseph Conant:

\_\_\_\_\_ YES

  X   NO

2. Did Marc Savage prove by a preponderance of the evidence that any of the Defendants, motivated by racial and/or religious animus, unlawfully discriminated against him by subjecting him to, failing to remedy, or perpetuating a racially and/or religiously hostile work environment?

The City of Springfield:

\_\_\_\_\_ YES

X \_\_\_\_\_ NO

Bernard Calvi:

\_\_\_\_\_ YES

X \_\_\_\_\_ NO

Joseph Conant:

\_\_\_\_\_ YES

X \_\_\_\_\_ NO

If your answer is "No" as to each of the Defendants in both Questions 1 and 2, that ends your deliberation as to Marc Savage's claims against the Defendants.

If your answer is "Yes" as to any of the Defendants on Questions 1 and/or 2, go to Question 3.

***Note:** If you answered "Yes" as to any of the Defendants on Questions 1 and/or 2, then you should award Mr. Savage either compensatory damages or nominal damages. However, you should **not** award both compensatory and nominal damages.*

3. Did Marc Savage prove by a preponderance of the evidence that he should be awarded compensatory damages?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ \_\_\_\_\_

**-OR-**

4. Do you find by a preponderance of the evidence that Marc Savage should be awarded nominal damages?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ \_\_\_\_\_

5. Did Marc Savage prove by a preponderance of the evidence that he should be awarded punitive damages?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

If your answer is "Yes," state the amount.

\$ \_\_\_\_\_

**B. Claims of Randolph Blake**

1. Did Randolph Blake prove by a preponderance of the evidence that any of the Defendants retaliated against him based on his participation in protected activities by subjecting him to a retaliatory hostile work environment or by other retaliatory acts?

The City of Springfield:

\_\_\_\_\_ YES

\_\_\_\_\_ ☒ NO

Bernard Calvi:

\_\_\_\_\_ YES

\_\_\_\_\_ ☒ NO

Joseph Conant:

\_\_\_\_\_ YES

\_\_\_\_\_ ☒ NO

2. Did Randolph Blake prove by a preponderance of the evidence that any of the Defendants, motivated by racial animus, unlawfully discriminated against him by subjecting him to, failing to remedy, or perpetuating a racially hostile work environment?

The City of Springfield:

\_\_\_\_\_ YES

\_\_\_\_\_ ☒ NO

Bernard Calvi:

\_\_\_\_\_ YES

\_\_\_\_\_ ☒ NO

Joseph Conant:

\_\_\_\_\_ YES

\_\_\_\_\_ ☒ NO

If your answer is "No" as to each of the Defendants in both Questions 1 and 2, that ends your deliberation as to Randolph Blake's claims against the Defendants.

If your answer is "Yes" as to any of the Defendants on Questions 1 and/or 2, go to Question 3.

***Note:** If you answered "Yes" as to any of the Defendants on Questions 1 and/or 2, then you should award Mr. Blake either compensatory damages or nominal damages. However, you should **not** award both compensatory and nominal damages.*

3. Did Randolph Blake prove by a preponderance of the evidence that he should be awarded compensatory damages?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ \_\_\_\_\_

**-OR-**

4. Do you find by a preponderance of the evidence that Randolph Blake should be awarded nominal damages?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ \_\_\_\_\_

5. Did Randolph Blake prove by a preponderance of the evidence that he should be awarded punitive damages?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

If your answer is "Yes," state the amount.

\$ \_\_\_\_\_



The undersigned foreperson of the jury hereby certifies that the members of the jury unanimously agree to the above findings.

6/25/2024 Date  Foreperson's Signature